

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

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In re:

03-MDL-1570 (GBD)(SN)

TERRORIST ATTACKS ON  
SEPTEMBER 11, 2001

IRAN NOTICE OF  
AMENDMENT

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This document relates to: Ashton et al v. al Qaeda Islamic Army, et al.,

No. 02-CV-6977(GBD)(SN).

Plaintiffs file this Notice of Amendment with respect to the underlying Complaint in the above-referenced matter, ECF No. 3237, as permitted and approved by the Court's Order of July 10, 2018, ECF No. 4045. Upon the filing of this Notice of Amendment, the underlying Complaint is deemed amended to add the individual(s) listed below (the "New Plaintiff(s)") as plaintiff(s) raising claims against the Islamic Republic of Iran. The underlying Complaint is deemed amended to include the allegations, as indicated below, of (a) the Federal Insurance and Ashton Plaintiffs' Amended Consolidated Complaint Against Defendant, the Islamic Republic of Iran, ECF No. 3237, or (b) the Amended Complaint, Burnett v. Islamic Republic of Iran, No. 15-CV-9903 (GBD)(SN) (S.D.N.Y. Feb. 8, 2016), ECF No. 53. The amendment effected through this Notice of Amendment supplements by incorporation into, but does not displace, the underlying Complaint. This Notice of Amendment relates solely to the Islamic Republic of Iran and does not apply to any other defendant.

Upon filing this Iran Notice of Amendment, each New Plaintiff is deemed to have adopted all factual and jurisdictional allegations of the complaint that has been joined as specified below; all causes of action contained within that complaint; all prior filings in

connection with that complaint; and all prior Orders and rulings of the Court in connection with that complaint.

Additionally, each New Plaintiff incorporates the factual allegations and findings contained in those pleadings and orders filed at Havlish v. Bin Laden, No. 1:03-CV-9848 (GBD)(SN) (S.D.N.Y.), ECF Nos. 263, 294, 295; In re Terrorist Attacks on September 11, 2001, 03-MDL-1570 (GBD)(SN) (S.D.N.Y.), ECF Nos. 2430, 2431, 2432, 2433, 2473, 2515, 2516; and evidence submitted at the proceedings before the Honorable George B. Daniels on December 15, 2011 (ECF No. 2540).

### **CAUSES OF ACTION**

Each New Plaintiff hereby adopts and incorporates herein by reference all factual allegations, jurisdictional allegations, and jury trial demand, including all causes of action against Iran, as set forth in the following complaint [**check only one complaint**]:

- Federal Insurance and Ashton Plaintiffs' Amended Consolidated Complaint Against Defendant, the Islamic Republic of Iran, ECF No. 3237
- Amended Complaint, Burnett v. Islamic Republic of Iran, No. 15-CV-9903 (GBD)(SN) (S.D.N.Y. Feb. 8, 2016), ECF No. 53

## IDENTIFICATION OF NEW PLAINTIFFS

Each New Plaintiff is or was a survivor of a person who died due to the terrorist attacks of September 11, 2001. For each New Plaintiff, the following chart lists the New Plaintiff's name, the New Plaintiff's residency and nationality, the name of the New Plaintiff's deceased family member, the New Plaintiff's relationship to the decedent, and the paragraph(s) of the underlying Complaint discussing the decedent and/or the decedent's estate.

	<b>Plaintiff's Name (alphabetical by last name)</b>	<b>Plaintiff's State of Residency (or death)</b>	<b>New Plaintiff's Citizenship/N ationality on 9/11/2001</b>	<b>9/11 Decedent's Name</b>	<b>New Plaintiff's Relationship to 9/11 Decedent</b>	<b>Paragraphs of Complaint Discussing 9/11 Decedent</b>
1	Brace, David E.	NY	USA	Conaty-Brace, Sandra J.	Spouse	N/A
2	DiAgostino, Christina	NY	USA	DiAgostino, Michael	Child	N/A
3	DiAgostino, Clara	NY	USA	DiAgostino, Michael	Personal Representative of the Estate of Carlo DiAgostino, deceased Parent of 9/11 Decedent Michael DiAgostino	N/A
4	DiAgostino, Donna	NY	USA	DiAgostino, Michael	Spouse	N/A
5	DiAgostino, Pauline	NY	USA	DiAgostino, Michael	Child	N/A
6	Genco, Annalisa Marie	NY	USA	Genco, Jr., Peter V.	Child	N/A

	Plaintiff's Name (alphabetical by last name)	Plaintiff's State of Residency at filing (or death)	New Plaintiff's Citizenship/Nationality on 9/11/2001	9/11 Decedent's Name	New Plaintiff's Relationship to 9/11 Decedent	Paragraphs of Complaint Discussing 9/11 Decedent
7	Genco, Diane	NY	USA	Genco, Jr., Peter V.	Spouse	N/A
8	Genco, Diane	NY	USA	Genco, Jr., Peter V.	Parent and legal guardian on behalf of V. R. G., minor child of 9/11 Decedent Peter V. Genco, Jr.	N/A
9	Hartz, Elinore	CT	USA	Hartz, John C.	Spouse	N/A
10	Jackman, Barbara	NY	USA	Jackman, Brooke A.	Personal Representative of the Estate of Robert Jackman, deceased Parent of 9/11 Decedent Brooke A. Jackman	N/A
11	Klares, Veronica	NY	USA	Klares, Richard J.	Spouse	N/A
12	Lasko, Elise Ann	NC	USA	Lasko, Gary E.	Child	N/A
13	Lasko, Kim L.	TN	USA	Lasko, Gary E.	Spouse	N/A
14	Lewis, Jerline	NC	USA	Bordeaux, Sherry Ann	Personal Representative of the Estate of Jerline Lewis, deceased Parent of 9/11 Decedent	N/A

	Plaintiff's Name (alphabetical by last name)	Plaintiff's State of Residency at filing (or death)	New Plaintiff's Citizenship/Nationality on 9/11/2001	9/11 Decedent's Name	New Plaintiff's Relationship to 9/11 Decedent	Paragraphs of Complaint Discussing 9/11 Decedent
					Sherry Ann Bordeaux	
15	Lewis, Jerline	NC	USA	Bordeaux, Sherry Ann	Personal Representative of the Estate of Steve Lewis, deceased Sibling of 9/11 Decedent Sherry Ann Bordeaux	N/A
16	Pegno, Michelle	NY	USA	Lunden, Michael P.	Parent and legal guardian on behalf of M. P., minor child of 9/11 Decedent Michael P. Lunden	N/A
17	Pegno, Michelle	NY	USA	Lunden, Michael P.	Spouse	N/A
18	Ryan, Autumn	FL	USA	Ryan, Jonathan S.	Child	N/A
19	Ryan-Baldwin, Maria L.	FL	USA	Ryan, Jonathan S.	Spouse	N/A
20	Ryan-Baldwin, Maria L.	FL	USA	Ryan, Jonathan S.	Parent and legal guardian on behalf of C. R., minor child of 9/11 Decedent	N/A

	Plaintiff's Name (alphabetical by last name)	Plaintiff's State of Residency at filing (or death)	New Plaintiff's Citizenship/Nationality on 9/11/2001	9/11 Decedent's Name	New Plaintiff's Relationship to 9/11 Decedent	Paragraphs of Complaint Discussing 9/11 Decedent
					Jonathan S. Ryan	
21	Silver, Holli	NY	USA	Silver, David	Spouse	N/A
22	Silver, Holli	NY	USA	Silver, David	Parent and legal guardian on behalf of D. S., minor child of 9/11 Decedent David Silver	N/A
23	Silver, Rachel	NY	USA	Silver, David	Child	N/A
24	Zinzi, Dyan	NJ	USA	Zinzi, Michael	Spouse	N/A
25	Zinzi, Dyan	NJ	USA	Zinzi, Michael	Parent and legal guardian on behalf of D. Z., minor child of 9/11 Decedent Michael Zinzi	N/A

Dated: November 27, 2018

Respectfully submitted,

KREINDLER & KREINDLER LLP

BY: /s/ James P. Kreindler  
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